

From: [Yenh Long](#)
To: [Darlene Nases](#)
Cc: [Jesette Phaynarikone](#); [Erin Miller](#); [David Wuest](#)
Subject: Fw: Alternative Language for Staffing Requirements
Date: Thursday, October 2, 2025 2:12:11 PM
Attachments: [Outlook-1w1qirch.png](#)
[Nevada Proposed Staffing Rules CS Amendments.pdf](#)

Hi Darlene,

Attached is public comment for the workshop.

Thank you,

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From: Walmsley, Lorri <lorri.walmsley@walgreens.com>
Sent: Thursday, September 18, 2025 2:43 PM
To: David Wuest <dwuest@pharmacy.nv.gov>; Yenh Long <ylong@pharmacy.nv.gov>
Cc: Kroeger, Victoria <victoria.kroeger@walgreens.com>; Liz MacMenamin <lizm@rannv.org>
Subject: Alternative Language for Staffing Requirements

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Hi Dave and Yenh,

I apologize for not getting this to you sooner. During our public testimony, we mentioned that centralized services were not taken into account in the current version of the rules. I have been thinking about some alternative ways to approach the regulation to address this concern. Please see our attached suggested language for the Board's consideration. I know the board is still working on potentially amending the volume in subsection 4, which we would also be supportive of.

I'm looking forward to continuing to collaborate to find a workable solution.

Warm Regards,

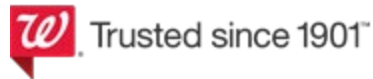
Lorri

Lorri Walmsley, RPh, FAzPA

Director, Pharmacy Affairs

Walgreen Co.

She/Her [why this matters](#)



Member of Walgreens Boots Alliance

[Book time with Walmsley, Lorri: Meeting with Lorri Walmsley](#)

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Blue italics - new proposed language.

Red italics - new proposed language

AUTHORITY: §§ 1 and 2, NRS 639.070; §§ 3-5, NRS 639.070 and 639.1371.

A REGULATION relating to pharmacy; establish standards for licensees relating to staffing, supervision, duties of a pharmacy, duties of a pharmacist and requirements related to the timing of dispensing prescription drugs and devices.

Section 1. Chapter 639 of NAC is hereby amended by adding thereto the provisions set forth as sections 2, 3, 4, 5, 6, 7 and 8 of this regulation.

Sec. 2.

1. *Except as otherwise provided in subsections 4 and 5, a pharmacy that dispenses controlled substances or dangerous drugs must be staffed with at least two pharmacists, who are fully dedicated to performing dispensing services, 80% of the time of each day the pharmacy is opened to the public or 65% of the time of each day the pharmacy is opened to the public if the pharmacy is open to the public 24 hours a day; and*
2. *During all other times when only one pharmacist is staffed, the pharmacy must be staffed with at least one pharmaceutical technician or intern pharmacist fully dedicated to performing dispensing services or at least two pharmaceutical technicians or two intern*

pharmacists or one pharmaceutical technician and one intern pharmacist dedicated to performing dispensing services if the pharmacy also operates a drive through window; and

- 3. If the pharmacy is performing non-dispensing services, the pharmacy must be staffed with an additional pharmacist designated to provide the non-dispensing services. This pharmacist may assist in providing dispensing services, including the dispensing of controlled substances or dangerous drugs, if, the professional judgement of the pharmacist, patient care and safety are not compromised.*
- 4. The requirements of subsection 1 do not apply on the days the pharmacy fills fewer than 100 prescriptions which is based the number of prescriptions filled on the same day in the previous annum.*
- 5. The requirements of subsection 1 do not apply if the pharmacy has additional pharmacist support for dispensing activities provided, such as central fill, data entry, data review, and clinical review from another offsite located pharmacist.*